

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Michael T. Lifrak (Bar No. 232430)  
2 michaelifrak@quinnemanuel.com  
Jeanine Zalduendo (Bar No. 243374)  
3 jeaninezalduendo@quinnemanuel.com  
865 South Figueroa Street, 10<sup>th</sup> Floor  
4 Los Angeles, California 90017-2543  
Telephone: (213) 443-3000  
5 Facsimile: (213) 443-3100

6 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Alex Spiro (*pro hac vice* forthcoming)  
7 alexspiro@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
8 New York, New York 10010  
Telephone: (212) 849-7000  
9

10 Attorneys for Defendants  
TESLA, INC., ELON MUSK, BRAD W. BUSS,  
11 ROBYN DENHOLM, IRA EHRENPREIS,  
ANTONIO J. GRACIAS, JAMES MURDOCH,  
12 KIMBAL MUSK, and LINDA JOHNSON RICE

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15  
16 SAN FRANCISCO DIVISION

17  
18 IN RE TESLA, INC. SECURITIES  
LITIGATION

Case No. 3:18-cv-04865-EMC

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL (ECF  
NO. 351)**

1 Pursuant to Northern District of California Civil Local Rules 6-1 and 6-2, Defendants Tesla,  
2 Inc., Elon R. Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James  
3 Murdoch, Kimbal Musk, and Linda Johnson Rice (collectively, “Defendants”), by and through their  
4 undersigned counsel of record, submit the following stipulation and proposed order:

5 WHEREAS, on December 16, 2021, Defendants substituted their counsel to the firm of  
6 Quinn Emanuel Urquhart & Sullivan, LLP. (ECF No. 350);

7 WHEREAS, counsel for Defendants have been working diligently to fully complete this  
8 transition and become familiarized with all issues in this case, including open discovery disputes  
9 between the parties, and in particular those that relate to confidentiality designations;

10 WHEREAS, on January 11, 2022, Plaintiff Glen Littleton (“Lead Plaintiff”), filed a Partial  
11 Motion for Summary Judgment (ECF No. 352) and an Administration Motion to File Under Seal  
12 (ECF No. 351) (“Motion to Seal”);

13 WHEREAS, the Northern District of California’s Civil Local Rule 79-5(f)(3) requires that  
14 Defendants respond to the Motion to Seal in 7 days, or by January 18, 2022;

15 WHEREAS, given the amount of confidential and highly confidential material that has been  
16 filed by Plaintiff in support of his Motion for Partial Summary Judgment, Defendants’ counsel  
17 require additional time to familiarize themselves with and assess the content of these materials in  
18 order to respond to the Motion to Seal;

19 WHEREAS, the parties have conferred and Lead Plaintiff does not object to the provision  
20 of additional time for Defendants to respond to the Motion to Seal.

21 NOW, THEREFORE, Defendants request that the Court enter an order providing  
22 Defendants with 14 days to respond to the Motion to Seal, such that a response would now be due  
23 on **January 25, 2022**.

1 Dated: January 14, 2022

LEVI & KORSINSKY, LLP

2  
3 By: /S/ Adam Apton

4 Adam Apton

5 *Attorneys for Plaintiff and Counsel for the*  
6 *Class*

7 Dated: January 13, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

8  
9 By: /S/ Michael T. Lifrak

MICHAEL T. LIFRAK

10 *Attorneys for Defendants*

11 \* \* \* \* \*

12 I hereby attest that I obtained concurrence in the filing of this document from each of the  
13 other signatories on this e-filed document.

14 Dated: January 14, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

15  
16  
17 By: /S/ Michael T. Lifrak

MICHAEL T. LIFRAK

18 \* \* \* \* \*

19 [PROPOSED] ORDER

20 PURSUANT TO THE TERMS OF THE ABOVE STIPULATION, it is so ORDERED.

21  
22 Dated: January \_\_, 2022

23 \_\_\_\_\_  
JUDGE EDWARD M. CHEN